

ATTACHMENT 2-3 IG INSPECTION SCHEDULE

1.0 INTRODUCTION

1.1 This attachment presents inspection requirements for the Igloo G storage required by R315-8-2.6 and R315-8-9. Attachment 2-3 is organized in the following sections:

- General inspection requirements
- Specific process inspection requirements
- References

2.0 GENERAL INSPECTION REQUIREMENTS: R315-8-2.6(a) and (b), R315-8-3.4

- 2.0.1** Dugway Proving Ground (DPG) must conduct regular inspections of hazardous wastes stored in Igloo G. These inspections include checks for signs of deterioration, tampering, malfunctions, and discharges that may cause a release of hazardous waste to the environment or pose a threat to human health. DPG must also inspect the security systems and contingency equipment to include air-monitoring items. All equipment identified in Attachment 2-6 and 2-7 of this permit shall be inspected at the frequency listed in this Attachment and Attachment 2-6. DPG has developed a written inspection schedule for preventing, detecting, or responding to environmental or human health hazards. An inspection schedule for items essential to the operation of Igloo G is included as Table 3-1. The Permittee will record all observations during inspections to include the date, time of inspection, the name of the inspector(s), and the nature of any malfunctions or repairs performed.
- 2.0.2** External inspections of Igloo G must be conducted on a weekly basis. Internal inspections of Igloo G will be performed on a weekly basis using remote video surveillance equipment. Physical inspections of the Igloo G interior are conducted on a quarterly or more frequent basis. Corrective actions determined during these inspections are taken and documented in the inspection reports according to R315-8-9 and R315-8-22.
- 2.0.3** All personnel entering the storage unit are required to wear appropriate personnel protective equipment (PPE). Attachment 2-6 specifies air emission monitoring sampling requirements, which are outlined in Attachment 2-11 of the Permit.
- 2.0.4** Prior to entering Igloo G, an air-monitoring technician monitors the ambient air inside Igloo G for the presence of chemical agent. Air samples are obtained through monitoring ports connected to tubing leading to various interior areas of Igloo G. Continuous air monitoring is performed to ensure that agent levels are below action levels specified in Attachment 2-11. The air-monitoring technician is also responsible for air monitoring of chemical agents during personnel entry of Igloo G. Summary analytical results of air monitoring are kept on file at the Igloo G facility manager's office.
- 2.0.5** A decontamination truck with a supporting decontamination team is required for each entry into Igloo G. Equipment used by the decontamination team for this purpose is listed in Attachment 2-6. The decontamination truck equipment is checked for operability by the decontamination team prior to arriving at the Igloo G site. Records of this inspection are maintained.

- 2.0.6 First entry procedures include a rapid inspection to look for any obvious hazards, contamination, spill, or container leaks. Continuous air monitoring is conducted whenever personnel are inside of Igloo G. The continuous air monitors will sound an alarm if action levels are detected. Spills and leaking containers shall be managed by first entry personnel in accordance with procedures outlined in the Igloo G contingency plan in Attachment 2-7 of this permit. All air monitoring test results shall be documented as required by this permit. DPG shall notify the Executive Secretary of any confirmed release of chemical agent to the environment (see Attachment 2-11, Section 6). This condition is applicable to releases detected during the monitoring conducted prior to entry into Igloo G.

2.1 Types of Problems: R315-8-2.6(b)

- 2.1.1 The Permittee shall check for potential problems as summarized in the inspection schedule provided in Table 3-1.

2.2 Frequency of Inspections: R315-8-2.6(b)

- 2.2.1 The frequency of inspection is listed in the inspection schedule in Table 3-1. Areas subject to spills, such as loading and unloading areas, shall be inspected daily when in use.

3.0 SPECIFIC PROCESS INSPECTION REQUIREMENTS

- 3.0.1 This section presents inspection requirements for the following equipment or facilities:

- Container
- Tank System
- Waste Pile
- Surface Impoundment
- Incinerator

3.1 Container Inspection: R315-8-9.5

- 3.1.1 The interior of Igloo G shall be inspected weekly using remote video surveillance equipment to ensure compliance with hazardous waste facility requirements. The interior of Igloo G shall be physically inspected on a quarterly basis. Exterior inspections of Igloo G shall be performed at least weekly by security personnel and confirmed during Igloo G inspections. Inspection personnel receive appropriate hazardous waste management training as specified in Attachment 2-4 of this permit.
- 3.1.2 After first-entry monitoring and access procedures are completed, all range recovered munition hazardous waste overpack containers shall be carefully observed to determine if they are in good condition. If evidence of deterioration (rust or cracking) is observed, or damage or other abnormal conditions are found, these shall be fully described in a memorandum prepared after the inspection checklist is completed. The location and identification number of each range recovered munition overpack are compared with the hazardous waste operating record information. Discrepancies are clearly explained. The facility manager maintains inspection records and record memoranda from each hazardous waste inspection. Inspection logs and operating records shall be stored in Igloo G facility manager's office at the Carr Facility.

Table 3-1 Inspection Schedule for Igloo G			
Frequency	Item	Inspection Components	Types of Problems
Weekly	Building 3643 (Igloo G) Interior Physical or Video	<ul style="list-style-type: none"> Containers/Pallets 	<ul style="list-style-type: none"> Damage or leakage Improper identification Improper labeling Improper storage Improper stacking Not sealed
		<ul style="list-style-type: none"> Overpack/Secondary containment 	<ul style="list-style-type: none"> Signs of damage, leakage, or spills
		<ul style="list-style-type: none"> Aisle Space 	<ul style="list-style-type: none"> Aisle obstructions
		<ul style="list-style-type: none"> Housekeeping Practices 	<ul style="list-style-type: none"> Clutter
Weekly	Building 3643 (Igloo G) Exterior	<ul style="list-style-type: none"> External Damage 	<ul style="list-style-type: none"> Damaged exterior Signs of unauthorized entry Damage to the entry door or the igloo exterior and "King Tut" blocks
		<ul style="list-style-type: none"> Fence Line Perimeter 	<ul style="list-style-type: none"> Damaged fencing Damaged gates
		<ul style="list-style-type: none"> Security System 	<ul style="list-style-type: none"> Broken lock or seal systems Damage or missing warning signs Inoperational alarm system (IDS)
Weekly	Contingency Plan (Site Managers Office)	<ul style="list-style-type: none"> Availability 	<ul style="list-style-type: none"> Missing or outdated Contingency Plan
Weekly	Management Equipment*	<ul style="list-style-type: none"> Usability 	<ul style="list-style-type: none"> Not available Not operational
Weekly	Emergency Operation Equipment*	<ul style="list-style-type: none"> Usability 	<ul style="list-style-type: none"> Not available Not operational
Monthly	Air Monitoring Equipment*	<ul style="list-style-type: none"> Usability 	<ul style="list-style-type: none"> Not available Not operational Not clean Not calibrated Methods not followed Summary monitoring results not available
Quarterly	First Entry and Decontamination Equipment*	<ul style="list-style-type: none"> Usability 	<ul style="list-style-type: none"> Not available Not operational
* Items and types of problems to be noted are listed in Attachment 2-6			